

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

IN RE NEW ENGLAND COMPOUNDING
PHARMACY, INC. PRODUCTS
LIABILITY LITIGATION

MDL No. 2419

Dkt. No. 1:13-md-2419 (FDS)

THIS DOCUMENT RELATES TO:

All Actions with Defendants, Premier Orthopaedics and Sports Medicine Associates of Southern New Jersey, LLC; Premier Orthopaedic Associates Surgical Center, LLC; Thomas Dwyer, M.D. and Kimberley Yvette Smith-Martin, M.D. a/k/a Kimberley Yvette Smith-Martin, M.D.

**STIPULATION FOR EXTENSION OF TIME
TO ANSWER PLAINTIFFS' COMPLAINT AND EXTENSION and/or TOLLING OF
STATUTE OF LIMITATIONS**

It is stipulated and agreed by and between the Plaintiffs' Steering Committee (hereinafter "PSC") and Defendants, Premier Orthopaedics and Sports Medicine Associates of Southern New Jersey, LLC; Premier Orthopaedic Associates Surgical Center, LLC; Thomas Dwyer, M.D. and Kimberley Yvette Smith, M.D. a/k/a Kimberley Yvette Smith-Martin, M.D. (hereinafter "Premier Defendants") that the Premier Defendants have a sixty(60) day extension of time from Friday, September 12, 2014, to answer the Plaintiffs' Complaints filed against them;

It is further stipulated and agreed by and between the PSC and the Premier Defendants that the Statute of Limitations is hereby extended to Monday, November 3, 2014 and Plaintiffs may file an action in these matters up through and including Monday, November 3, 2014 without the Premier Defendants raising the Statute of Limitations as a defense.

Discovery relating to Premier Defendants will commence forthwith and nothing in this agreement will prevent such discovery from proceeding forthwith.

This Stipulation may be executed in counterparts.

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KIMBERLY YVETTE SMITH, MD

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APPROVED BY THE COURT:

J.